

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

**Hearing Date:** September 27, 2022  
**Hearing Time:** 10:00 AM

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In re:

Chapter 11

Gerasimos Stefanitsis,

Case No. 22-22507-shl

Debtor.

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**DEBTOR’S MOTION TO CONVERT THE CASE UNDER CHAPTER 11  
TO A CASE UNDER CHAPTER 13**

**TO: HONORABLE SEAN H. LANE  
UNITED STATES BANKRUPTCY JUDGE**

Gerasimos Stefanitsis, the debtor (the “Debtor”) in the above-mentioned case, by and through his counsel, Morrison Tenenbaum PLLC., hereby submits this motion (the “Motion”) for entry of an Order pursuant to section 1112 of title 11 of the United States Code (the “Bankruptcy Code”) allowing the Debtor to convert the case under Chapter 11 to a case under Chapter 13. In support of his Motion, the Debtor respectfully represents as follows:

1. The Debtor filed his voluntary petition under Chapter 11 on August 1, 2022.
2. After due deliberation, the Debtor decided to convert the case to one under Chapter 13 in order to proceed in a more cost-effective manner and better administer the case for the benefits of his creditors.
3. Creditors of the Debtor will not be harmed by this conversion and will receive the same distribution they would receive under a Chapter 11 case.
4. As a result of the Bankruptcy Threshold Adjustment and Technical Corrections Act signed on June 21, 2022, the debt threshold for a Chapter 13 case is increased to \$2,750,000 and the Debtor now qualifies to convert his case to a Chapter 13.

WHEREFORE, the Debtor respectfully requests that the Court grant the Motion and enter an Order converting the case under Chapter 11 to a case under Chapter 13 of the Bankruptcy Code, and granting the Debtor such other and further relief as the Court deems just and equitable.

Dated: New York, New York  
August 30, 2022

Respectfully Submitted,

Morrison Tenenbaum PLLC.



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By: Lawrence Morrison, Esq.

*Counsel to Debtor*

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**VERIFICATION**

The undersigned having reviewed the attached Motion and being familiar with the facts contained therein, verifies under the penalties of perjury, that the information contained therein is complete, accurate and truthful to the best of my knowledge.

  
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By: Gerasimos Stefanitsis, the Debtor